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7
8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$22,000.00 IN
U.S. CURRENCY,

15 APPROXIMATELY \$18,000.00 IN
16 U.S. CURRENCY, and

17 APPROXIMATELY \$9,970.00 IN
18 U.S. CURRENCY,

19 Defendants.

2:23-MC-00423-WBS-DB

STIPULATION AND ORDER EXTENDING TIME
FOR FILING A COMPLAINT FOR FORFEITURE
AND/OR TO OBTAIN AN INDICTMENT
ALLEGING FORFEITURE

20 It is hereby stipulated by and between the United States of America and potential claimant Jamal
21 Christopher Spratling (“claimant”), by and through their respective counsel, as follows:

22 1. On or about September 21, 2023, claimant filed a claim in the administrative forfeiture
23 proceeding with the Drug Enforcement Administration with respect to the Approximately \$22,000.00 in
24 U.S. Currency, Approximately \$18,000.00 in U.S. Currency, and Approximately \$9,970.00 in U.S.
25 Currency (hereafter collectively “defendant currency”), which was seized on July 6, 2023.

26 2. The Drug Enforcement Administration has sent the written notice of intent to forfeit
27 required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any
28 person to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other

1 than claimant has filed a claim to the defendant currency as required by law in the administrative
2 forfeiture proceeding.

3 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
4 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
5 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative
6 forfeiture proceeding, unless the court extends the deadline for good cause shown or by agreement of the
7 parties. That deadline is December 20, 2023.

8 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to
9 January 19, 2024, the time in which the United States is required to file a civil complaint for forfeiture
10 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
11 subject to forfeiture.

12 5. Accordingly, the parties agree that the deadline by which the United States shall be
13 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment
14 alleging that the defendant currency is subject to forfeiture shall be extended to January 19, 2024.

15 Dated: 12/20/2023

PHILLIP A. TALBERT
United States Attorney

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17 By: /s/ Kevin C. Khasigian
KEVIN C. KHASIGIAN
Assistant U.S. Attorney


18
19 Dated: 12/20/2023

/s/ Curtis Fallgatter
CURTIS FALLGATTER
Fallgatter, Catlin, & Varon, P.A.
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Jacksonville, FL 32202
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Attorney for potential claimant
Jamal Christopher Spratling

(Signature authorized by email)

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26 **IT IS SO ORDERED.**

27 Dated: December 21, 2023


WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE